

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**UNITED STATES OF AMERICA and
THE STATE OF TEXAS, *ex rel.*
THOMAS HEADEN, III**

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Plaintiff,

vs.

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**CIVIL ACTION NO. 4:18-CV-cv-00773
JURY DEMANDED**

**ABUNDANT LIFE THERAPEUTIC
SERVICES TEXAS, LLC, JON FORD,
and JOHN DOES (1-50) INCLUSIVE;**

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Defendants.

**DEFENDANT JON FORD’S JOINDER IN DEFENDANT ABUNDANT LIFE
SOLUTIONS THERAPEUTIC SERVICES TEXAS, LLC’S REPLY IN SUPPORT OF
SECOND AMENDED COMPLAINT (DKT.31) AND DEFENDANT ABUNDANT
LIFE SOLUTIONS THERAPEUTIC SERVICES TEXAS, LLC’S REPLY TO THE
STATE OF TEXAS’ STATEMENT OF INTEREST (DKT.29)**

COMES NOW, Defendant, JON FORD (“Ford”), and hereby joins in Defendant ABUNDANT LIFE THERAPEUTIC SERVICES TEXAS, LLC (“Abundant Life”) Reply in Support of its Motion to Dismiss Second Amended Complaint (DKT.31) and Reply to the State of Texas’ Statement of Interest (DKT.29) and respectfully states as follows:

Joinder

Defendant Ford joins in, incorporates, and adopts by reference the arguments presented to the Court in Defendant Abundant Life’s Reply in Support of Motion to Dismiss Second Amended Complaint (DKT.31) filed on March 6, 2019 as if fully set forth herein. Defendant Ford also joins in, incorporates, and adopts by reference the arguments presented to the Court in Defendant Abundant Life’s Reply to the State of Texas’ Statement of Interest (DKT.29) filed on March 5, 2019.

Defendant Ford respectfully requests that the Court grant the Motion Dismiss the Second Amended Complaint and dismiss all claims asserted by Plaintiffs with prejudice and grant Defendant such other relief to which it may be entitled at law or in equity. A proposed order is attached for the Court's consideration.

Conclusion & Prayer

WHEREFORE, PREMISES CONSIDERED, Defendant JON FORD, respectfully requests that the Court grant the Motion to Dismiss Second Amended Complaint (DKT.22) filed February 5, 2019, and grant all such other relief to which Defendant JON FORD may be entitled.

Respectfully submitted,
HENDERSHOT, CANNON & HISEY, P.C.

/s/ Simon W. Hendershot
SIMON W. HENDERSHOT, III
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**ATTORNEYS FOR DEFENDANT,
JON FORD**

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of March, 2019, a true and correct copy of the above was served upon the attorneys of record in the above entitled and numbered cause, via ECF filing.

/s/ Simon W. Hendershot, III
SIMON W. HENDERSHOT, III

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